

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ABC Corporation I et al,

Plaintiff,

v.

THE PARTNERSHIPS And
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No.: 1:20-cv-04806

Judge Honorable Thomas M. Durkin

Magistrate Judge Jeffrey Cole

**DEFENDANT AND THIRD-PARTY RESPONDENTS’
UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendant Gyroor-US (“Defendant” or “Gyroor-US”) and Third-Party Respondents Gyroor, Urbanmax, GaodeshangUS, Fengchi-US, Gyroshoes, Jiangyou-US¹, Shenzhen Yanjingmaoyi Co., Ltd., and HGSM (collectively, “Third-Party Respondents”) file this motion requesting leave to file under seal Defendant and Third-Party Respondents’ damage report, with accompanying sales data, included as part of Defendant and Third-Party Respondents’ Motion for Damage. [Dkt.696].

Sealing this portion of the file is necessary because it contains Defendant and Third-Party Respondents’ confidential business information including sales data and cost of goods sold. On February 6, 2024, Defendant and Third-Party Respondents informed Plaintiffs Hangzhou Chic Intelligent Technology Co., Ltd. (“Chic”) and Unicorn Global, Inc.’s (“Unicorn”, collectively with “Chic”, “Plaintiffs”) counsel through email that they intend to file Defendant and Third-Party

¹ Jiangyou-US is a former defendant but was dismissed from this case on June 21, 2022. [Dkt. 561].

Respondents' damage report and accompanying sales data under seal, and Plaintiffs do not oppose the data referenced in the email being filed under seal.

Date: 2/9/2024

/s/ Wei Wang

Wei Wang, Esq.
GLACIER LAW LLP
41 Madison Avenue, Ste 2529
New York, NY 10010
wei.wang@glacier.law
332-777-7315

GLACIER LAW LLP
506 Second Ave., Ste 1516
Seattle, WA 98104
Na Zhang, Esq.
queena.zhang@glacier.law
206-397-8633

GLACIER LAW LLP
200 E. Randolph Dr., Ste. 5100
Chicago, IL 60601
Ruoting Men, Esq.
ruoting.men@glacier.law
Tianyu Ju, Esq.
iris.ju@glacier.law
312-270-0413

***Attorneys for Defendant and Third-
Party Respondents***

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this February 9, 2024, I electronically filed the foregoing file with the Clerk of Court using the CM/ECF system, and service was perfected on all counsel of record and interested parties through this system, which will deliver a true and correct copy of the foregoing documents via CM/ECF.

Date: 02/09/2024

/s/ Wei Wang

Wei Wang, Esq.